

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

LINDSAY LIEBERMAN,

Plaintiff,

-against-

C.A. GOLDBERG, PLLC &  
CARRIE A. GOLDBERG,

Defendants.

Case No. 21-CV-05053

**ANSWER**

Defendants, by their attorneys, Crumiller P.C., as and for their answer to the Complaint, allege as follows:

1. Defendants consent to the jurisdiction and venue of the Court.
2. Defendants admit the allegations contained within paragraphs 4, 5, 8, and 33.
3. Defendants deny the allegations contained within paragraphs 1, 2, 3, 10, 11, 12, 13, 15, 20, 21, 22, 23, 26, 27, 28, 29, 30, 31, 32, 35, 36, 37, 38, 39, 40, 41, 42, 45, 46, 47, 48, 50, 51, 52, 53, 54, 56, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 75, 76, 77, 78, 79, 80, 81, 83, 84, 85, 86, 87, 88, 89, 90, 92, 93, 94, 95, 96, 97, 99, 102, 103, 104, 105, 106, 107, 109, 111, 112, 113, 114, 115, 116, 117, 119, 121, 122, 123, 124, and 125.
4. Defendants lack information sufficient to form a belief as to the truth of the allegations contained within paragraphs 6, 7, 9, 14, 16, 17, 18, 19, 24, 25, 34, 43, 44, 49, 55, and 57.
5. Paragraphs 74, 82, 91, 98, 100, 101, 108, 110, 118, 120, and 126 consist of legal assertions for which no factual response is warranted.
6. Defendants consent to the applicability of the New York City Human Rights Law, N.Y.C. Admin. Code § 8-107 *et seq.*, and the New York State Human Rights Law, N.Y. Exec. Law § 296(1)(a) *et seq.* Defendants therefore consent to the deemed withdrawal of Plaintiff's Fifth, Sixth, and Seventh Causes of Action, which are pled in the alternative pursuant to the Rhode

Island Fair Employment Practices Act, R.I. Gen. Laws §§ 28-5-1 *et seq.*, and the Rhode Island Civil Right Act, R.I. Gen. Laws §§ 42-112-1 *et seq.*

#### FIRST DEFENSE

7. The Complaint fails, in whole or in part, to state a claim under which relief may be granted.

#### SECOND DEFENSE

8. Defendants' actions were based on legitimate, non-discriminatory, and non-retaliatory business reasons, which Plaintiff cannot establish were pretext for unlawful discrimination or retaliation.

#### THIRD DEFENSE

9. Plaintiff has failed to mitigate her alleged damages.

WHEREFORE, it is respectfully requested that this Court issue an order dismissing the complaint with prejudice, awarding Defendants reasonable attorney's fees and costs, and granting such other relief as may be just.

Dated: September 14, 2021  
Brooklyn, New York

/s/  
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